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Attorneys for Plaintiff and
Counterclaim Defendant
NEOCONIX, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NEOCONIX, INC., a Delaware corporation,

Plaintiff,

v.

R&D CIRCUITS, INC., a New Jersey
corporation; R&D SOCKETS, INC., a
Delaware Corporation,

Defendants.

Case No. 12-cv-06153 MMC (EDL)

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO STAY CASE PENDING
SETTLEMENT**



Date: March 17, 2014

1 WHEREAS, Plaintiff Neoconix, Inc., Defendant R&D Circuits, Inc., and Defendant and
 2 Counterclaim Plaintiff R&D Sockets, Inc., (collectively, "the Parties") have executed a term sheet
 3 to settle the litigation and desire to devote their resources to finalizing settlement of this action,
 4 the Parties hereby stipulate and agree to immediately stay the litigation and all case management
 5 and related deadlines.

6 THEREFORE, subject to the Court's approval, the parties agree and stipulate to
 7 immediately stay the above-captioned case and all case management and related deadlines
 8 pending negotiation of the long form settlement agreement.

9 The parties further agree and stipulate that in the event negotiations relating to execution
 10 of a long form settlement agreement fail, and the parties seek to lift the stay, the parties will
 11 jointly submit a Case Management Statement and Proposed Order that seeks to re-establish the
 12 current Case Management Order (including, *e.g.*, limits on asserted claims and prior art, limits on
 13 electronic discovery, and with the general structure of the current schedule), with the
 14 understanding that R&D will be given at least 30 days to complete its preliminary infringement
 15 contentions, and all subsequent case deadlines will be pushed back in accordance with the current
 16 schedule.

17
 18 Respectfully submitted,

19 Dated: March 17, 2014

KEKER & VAN NEST LLP

21 By: /s/ Ajay S. Krishnan
 22 STUART L. GASNER
 23 AJAY S. KRISHNAN

Attorneys for Plaintiff NEOCONIX, INC.

24 Dated: March 17, 2014

WOODCOCK WASHBURN LLP

25
 26 By: /s/ Erich M. Falke
 27 ERICH M. FALKE

Attorney for Defendants R&D CIRCUITS,
 28 INC., and R&D SOCKETS, INC.